

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.) Case No. 04-10245-RGS
)
ANDREW PERRY)

JOINT MOTION OF THE PARTIES TO EXCLUDE TIME

The parties hereby move, pursuant to 18 U.S.C. §3161(h)(8)(A), to exclude the period of time commencing on March 24, 2005, and ending on April 14, 2005. It is expected that the requested extension would allow the parties additional time to negotiate a plea.

WHEREFORE, both parties respectfully request, under 18 U.S.C. §3161(h)(8)(A), that this Court find, based on the above, that the ends of justice served by granting the requested exclusions outweigh the best interest of the public and the defendant in a speedy trial, and, accordingly, exclude the above period in computing the time within which trial must commence under 18 U.S.C. §3161.

Respectfully Submitted,

ANDREW PERRY
By His Attorney

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/ Timothy Watkins
Timothy Watkins, Esq.

/s/ William H. Connolly
WILLIAM H. CONNOLLY
Assistant U.S. Attorney

March 25, 2005

February 10, 2003